



San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

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June 3, 2013

Mr. John Nuffer, Buildings and Appliances Office, MS-25
Mr. Harinder Singh, Buildings and Appliances Office, MS-25
Mr. Tuan Ngo, P.E., Appliances and Process Energy Office
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
12-AAER-2C

TN 71110

JUN 04 2013

Subject: 2013 Appliance Efficiency Rulemaking for Water Appliances,
Docket 12-AAER-2C

Dear Messrs. Nuffer, Singh, and Ngo,

I am writing on behalf of the San Francisco Public Utilities Commission (SFPUC) to provide input as part of the 2013 Appliance Efficiency Rulemaking process. Please enter this letter as part of the public record.

The SFPUC is a Department of the City and County of San Francisco and is comprised of three essential 24/7 service utilities: Water, Power, and Sewer. We are the third largest public utility in California, working in seven California counties with a combined annual operating budget of over \$850 million.

We understand that the California Energy Commission (CEC) is in the early stages of developing revised efficiency standards for toilets, urinals and faucets. As you deliberate these standards, we would like to report on our response to stakeholder comments that argue that low-flow toilets are incompatible with wastewater collection systems because of increased odors.

The SFPUC's challenge to the containment of odors comes from a combination of weather, design and lower flows as a result of water conservation – not simply low-flow toilets. Rather than focus on one small contributing odor factor, we believe that the solution is for utilities to adapt sewer systems to accommodate a more water-efficient future.

The SFPUC operates a combined wastewater system that treats stormwater and sanitary flows. San Francisco is one of relatively few cities across the nation (under 800) with a combined system (collecting and treating both urban stormwater and sanitary flows); most have separate systems. Pipes in combined sewer systems are designed to accommodate high volumes of storm flow and typically are much larger than those in sanitary-only systems. In larger pipes, particularly those in flat areas, low-volume dry month flows move more slowly and sometimes lead to sedimentation and odors.

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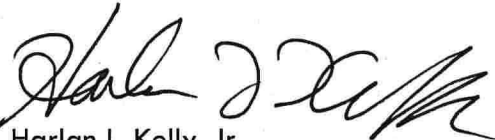
Much of San Francisco's wastewater system was built prior to the 1980s when pipes and infrastructure were not designed to accommodate lower flow scenarios. Since then, wastewater flows have dropped 25 percent in part due to more efficient water use.

The SFPUC is undertaking a major sewer system improvement capital program to upgrade the city's entire aging wastewater system to ensure its efficient and sustainable operation into the future. The comprehensive program includes many improvements that will prevent and minimize odors, including detailed modeling of the entire system to help identify the sources and causes of odor; redesign of pipes, pump stations and other components to speed flow and reduce detention time; a variety of biological and chemical options that eliminate odors before they occur; and use of treated wastewater and stormwater to flush areas, among other projects.

While efforts to curb odors are important to the quality of life of our residents, they do not need to come at the expense of our water conservation goals. Rather, utilities have the opportunity to adapt sewer systems to accommodate a more water-efficient future with improved standards. The SFPUC has made this approach part of our long-term capital and operational planning.

Thank you for considering our input as part of the 2013 Appliance Efficiency Rulemaking process. If you have questions or need additional information, please do not hesitate to contact me at (415) 554-0740 or HKelly@sfwater.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Harlan L. Kelly, Jr.", written in a cursive style.

Harlan L. Kelly, Jr.
General Manager